

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

**HUNTINGTON DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**Criminal No. 3:22-cr-00087**

**ALEX KAI TICK CHIN**

**DEFENDANT'S MOTION TO PARTICIPATE  
BY VIDEO CONFERENCE CALL FOR ANY HEARING SCHEDULED  
FOR THE GOVERNMENT'S MOTION TO REVOKE RELEASE ORDER**

The defendant, Alex Kai Tick Chin, is currently detained in the Santa Rita Jail located at 5325 Broder Boulevard, Dublin, California. Counsel has been able to schedule video conference calls with the defendant through that facility. Should this Court decide to schedule a hearing on the Government's pending Motion, the defendant would request to be permitted to participate via a video conference call from the Santa Rita Jail. The defendant's position remains that he should be released on bond with the directive to maintain his residence at the GeoCare halfway house facility in San Francisco, California, with the special condition of electronic monitoring. Allowing the defendant to participate by video conference call would eliminate the expense of having the U.S. Marshal's Service provide transportation to have the defendant returned to this District.

For the reasons stated herein, the defendant respectfully requests that this Motion be granted and that the appropriate Order be given directing that the Court's

IT staff make the necessary arrangements for the defendant to participate through a video conference call.

Respectfully submitted this 11th day of July, 2022.

**ALEX KAI TICK CHIN**

**By Counsel**

**WESLEY P. PAGE  
FEDERAL PUBLIC DEFENDER**

**s/David R. Bungard**

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